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Attorney for Defendant George McKenna

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 \* \* \*

10 )  
11 UNITED STATES OF AMERICA )  
12 Plaintiff, )  
13 vs. )  
14 JACOB VILLANUEVA, JR. et al., ) CASE NO.: 2:12-CR-0082  
15 Defendants. )  
16 )  
17 )  
18 )  
DEFENDANT GEORGE MCKENNA'S  
UNOPPOSED MOTION TO CONDUCT  
A PRE-PLEA PRESENTENCING  
INVESTIGATION REPORT AND  
PROPOSED ORDER

19 Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a  
20 Pre-Plea Presentence Investigation Report be prepared by the Probation Department.

21 1) It appears that defendant may be subject to substantially different sentencing ranges  
22 depending upon his verified criminal history as well as other factors surrounding his offense  
23 and plea. Defendant McKenna's decision regarding how to proceed may be drastically

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1 impacted by his sentencing exposure in this regard. The pre-plea presentence report will  
2 promote judicial economy and aid in the manner in which this case is ultimately resolved.  
3

4       2) Undersigned counsel therefore respectfully requests an order that the Department of  
5 Probation conduct a pre-plea presentence investigation report as soon as possible.  
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7       3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney  
8 Kimberly Frayn regarding this request and she has no opposition.  
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10                     DATED this 10th day of July, 2012.

11                     \_\_\_\_\_  
12                     /s/Philip H. Brown \_\_\_\_\_  
13                     PHILIP H. BROWN, ESQ.  
14                     200 HOOVER AVE, SUITE #130  
15                     LAS VEGAS, NEVADA 89101  
16                     ATTORNEY FOR THE DEFENDANT  
17                     GEORGE McKENNA  
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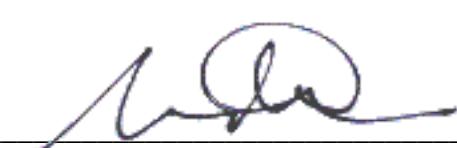
7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 \* \* \*

10 UNITED STATES OF AMERICA )  
11 Plaintiff, ) CASE NO.: 2:12-CR-0082  
12 vs. )  
13 JACOB VILLANUEVA, et. al., ) ORDER GRANTING DEFENDANT  
14 Defendants. ) GEORGE MCKENNA'S UNOPPOSED  
MOTION FOR PRE-PLEA  
PRESENTENCING INVESTIGATION  
REPORT  
15 )  
16 )  
17 )

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence  
Investigation Report on Defendant George McKenna.

DATED this the 11th day of July, 2012.

23   
24 U.S. DISTRICT JUDGE  
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3                   **CERTIFICATE OF SERVICE**  
4  
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6                   The undersigned hereby certifies that she is an employee of Brown Law Offices,  
7 Chartered, and is a person of such age and discretion as to be competent to serve papers.  
8

9                   That on July 10, 2012, she served an electronic copy of the above and foregoing  
10                  UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING  
11                  INVESTIGATION REPORT by electronic service (ECF) to the person named below:  
12  
13

14                  DANIEL BOGDON  
15                  United States Attorney  
16

17                  KIMBERLY FRAYN  
18                  Assistant United States Attorney  
19                  333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
20                  Las Vegas, NV 89101  
21  
22

23                  /s/ Mary D. Brown  
24  
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26                  Employee of Brown Law Offices, Chartered  
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